

EXHIBIT E

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

DIGITAL VERIFICATION

SYSTEMS, LLC,

Plaintiff,

v.

No. 5:22-cv-00686-JWH-SP

ENCYRO, INC.,

Defendant.

ZOOM DEPOSITION OF LEIGH ROTHSCILD

VOLUME 1 - PAGES 1-130

WEDNESDAY, OCTOBER 12, 2022

NORTH MIAMI, FLORIDA

Reported by: Marilyn Hoover, RPR

California CSR No. 8841

1 BE IT REMEMBERED THAT, pursuant to the Federal
2 Rules of Civil Procedure, the Zoom video deposition of
3 LEIGH ROTHSCCHILD was taken before Marilynn Hoover,
4 California CSR No. 8841; on Wednesday, October 12,
5 2022, commencing at the hour of 1:06 p.m.; the witness
6 testifying from North Miami, Florida.

7
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23 On behalf of Defendant

24
25 ALSO PRESENT: Sugouri Batra, in-house counsel

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Examination by Ms. Lamkin

5

* * *

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1 WEDNESDAY, OCTOBER 12, 2022; NORTH MIAMI, FLORIDA

2 LEIGH ROTHSCILD,

3 called as a witness, being duly sworn on oath, was
4 examined and did testify as follows:

5 THE STENOGRAPHIC REPORTER: Thank you. You 13:06
6 may begin. 13:06

7 EXAMINATION 13:06

8 BY MS. LAMKIN: 13:06

9 Q. Good morning, and afternoon, Mr. Rothschild. 13:06

10 A. Thank you. 13:06

11 Q. My name is Rachael Lamkin and I represent 13:06
12 the defendant in this action. 13:06

13 I see you have two attorneys with you here 13:06
14 today; is that correct? 13:06

15 A. Yes. 13:06

16 Q. Okay. Mr. Palavan is your outside counsel; 13:06
17 correct? 13:06

18 A. That is correct. 13:06

19 Q. Okay. And Ms. Batra, can you please state 13:06
20 her role for the record. 13:06

21 A. Yes. She is general counsel to the company. 13:06

22 Q. "The company" being plaintiff, what I will 13:06
23 call DVS for your deposition. Is that okay? 13:06

24 A. Yes. She's general counsel to the 13:06
25 plaintiff. 13:06

1 A. It is. 13:24

2 Q. Is this the patent that you reviewed on your 13:24

3 Zoom call with your counsel, Mr. Palavan and 13:24

4 Ms. Batra? 13:24

5 A. It is. 13:24

6 Q. If you could please turn to the column 1 of 13:24

7 the '860 patent, Mr. Rothschild. 13:24

8 Mr. Rothschild, who drafted -- 13:25

9 A. Excuse me, Ms. Lamkin. I need time to get 13:25

10 there. I'm not quite there. Thank you. 13:25

11 Q. Um-hum. 13:25

12 A. I'm there now, Ms. Lamkin. 13:25

13 Q. Mr. Rothschild, who drafted column 1 of the 13:25

14 '860 patent? 13:25

15 A. The draft was done by patent prosecution 13:25

16 counsel. 13:25

17 Q. Did you review column 1 of the '860 patent 13:25

18 during prosecution? 13:25

19 A. I do not recall with specificity. 13:25

20 I would point out, I would add to that 13:25

21 answer, if I may, Ms. Lamkin: That was many, many 13:25

22 years ago, I believe 2008, so -- I believe, so many 13:25

23 years ago. More than ten? Yes, 2008. I'm looking at 13:25

24 the patent to get that date. So that is, by my 13:25

25 calculations, approximately 14 years ago. 13:26

1 Q. You did review this patent with your counsel 13:26
2 and last night; correct? 13:26
3 A. We looked at the patent last night, 13:26
4 Ms. Lamkin. We -- We reviewed the patent last night. 13:26
5 Q. And you also reviewed the patent on your own 13:26
6 last night? 13:26
7 A. Yes. 13:26
8 Q. Okay. Mr. Rothschild, how would you explain 13:26
9 what a module generating assembly in the '860 patent 13:26
10 is to a jury? 13:26
11 A. I would have to look, Ms. Lamkin -- Well, I 13:26
12 would answer by telling you that -- I'm sorry. Could 13:26
13 you repeat the term again, Ms. Lamkin. I'd appreciate 13:26
14 that. 13:26
15 Q. Module generating assembly. 13:26
16 A. I would say that a module generating 13:26
17 assembly is what it says in the specification of the 13:26
18 9,054,860 patent. 13:26
19 Q. Yes, sir. I'm asking, in your words, how 13:27
20 you would explain that term to a jury. 13:27
21 A. I would explain it to the jury that it is 13:27
22 what it says in the specification as published in the 13:27
23 9,054,860 patent. 13:27
24 Q. So you have -- Other than how a module 13:27
25 generating assembly is in the patent, you have no 13:27

1 other -- Strike that. 13:27

2 You will solely rely upon the patent's 13:27

3 description for module generating assembly in this 13:27

4 litigation? 13:27

5 A. Could you rephrase the question, please, or 13:27

6 repeat the question. 13:27

7 Q. You will solely rely on the '860 patent's 13:27

8 description of a module generating assembly in this 13:27

9 litigation? 13:28

10 A. I will answer your question by saying: What 13:28

11 is -- What is that module? That the module is what it 13:28

12 says it is in the patent specification of the 13:28

13 9,054,860 patent, the asserted patent, the patent used 13:28

14 in the complaint, filed in the complaint. 13:28

15 Q. Sir, my question is this: My client is 13:28

16 entitled to know how you, as the named inventor, would 13:28

17 describe a module generating assembly to the jury. 13:28

18 You understand that? 13:28

19 A. I'm not an attorney, Ms. Lamkin, so I don't 13:28

20 know what your client is entitled to or not. I 13:28

21 honestly don't. So my counsel may know, you may know, 13:28

22 but I don't have any idea what your client is entitled 13:28

23 to. 13:28

24 I will tell you that the specification 13:28

25 speaks to all kinds of terminology, and I would tell 13:28

1 line 46. 14:00

2 Q. I want to be perfectly clear that what I'm 14:00

3 asking for is not where in the specification the term 14:00

4 "module generating assembly" is mentioned. 14:00

5 What I'm asking for specifically is: Where 14:00

6 in the specification is the teaching or the 14:00

7 description that corresponds to the claim limitation 14:00

8 I've read into the record at column 9, lines 9 14:00

9 through 11? 14:01

10 That's the only thing I want, is: Where in 14:01

11 the specification is the teaching that corresponds to 14:01

12 the limitation at column 9, lines 9 through 11? 14:01

13 A. Great. Great. I would tell you, in answer 14:01

14 to your question, that I find information -- I don't 14:01

15 know whether -- what the term -- not being an attorney 14:01

16 or a patent attorney, what the term "teaching" means; 14:01

17 but I find information on module generating assembly 14:01

18 in column 1, line 46, where it says -- and I will read 14:01

19 slowly. 14:01

20 Q. It's okay, Mr. Rothschild. It's okay. You 14:01

21 don't have to read into the record. 14:01

22 If you'll just give me the citations. 14:01

23 Column 1, starting at which line? 14:01

24 A. Line 45 to 48 -- to 49. 14:01

25 Q. Okay. And can you please provide any other 14:02

1 citations to the specification that describe the 14:02
2 limitation disclosed at column 9, lines 9 through 11? 14:02
3 A. Yes. I find the term "module generating 14:02
4 assembly" in line -- approximately line column 2, 14:02
5 line 17 through 24. 14:02
6 Q. Great. Others? 14:02
7 A. I find the term "module generating assembly" 14:02
8 in column 3, line 46 to 55. 14:02
9 Q. Thank you. Any others? 14:03
10 A. I find the term "module generating assembly" 14:03
11 in the specification of the '860 patent in column 5, 14:03
12 line -- approximately line 5 through line 15 -- I'm 14:03
13 sorry -- line 14. 14:03
14 Q. Thank you, sir. Any others? 14:03
15 A. I find the term "module generating assembly" 14:03
16 in column 5 of the '860 patent, in line 22 -- 14:03
17 approximately line 22 to line 26. 14:03
18 Q. Thank you. Others? 14:03
19 A. I find the term "module generating assembly" 14:03
20 in the '860 patent -- asserted patent, in column 5, 14:04
21 line 30 through line 35. 14:04
22 Q. Thank you. Any others? 14:04
23 A. I find the term "module generating assembly" 14:04
24 in the '860 patent in line, approximately, 53 -- 14:04
25 column 5, line 53 through line approximately 60 -- 14:04

1 fifty -- correcting that to line 59. 14:04

2 Q. Thank you, Mr. Rothschild. 14:04

3 And any other discussions of citation -- 14:04

4 Sorry. Strike that. 14:04

5 Any other discussions in the specification 14:04

6 of the '860 patent for the limitation disclosed at 14:04

7 column 9, lines 9 through 11? 14:04

8 A. Ms. Lamkin, I can't say with specificity if 14:05

9 there's any others; but those are ones that I noted 14:05

10 when I reviewed the patent a few minutes ago during 14:05

11 our break, that are contained within the 14:05

12 specifications. To be clear, there may be others. 14:05

13 Q. Okay. Please take your time, sir. I need 14:05

14 you to highlight all of them. Take it -- This is why 14:05

15 we're here: You're the named inventor on this patent 14:05

16 and we need to understand it. 14:05

17 So I need to know, in your opinion, all 14:05

18 discussions in the specification for the limitation at 14:05

19 column 9, lines 9 through 11. 14:05

20 A. Those are the ones, Ms. Lamkin, that I've -- 14:05

21 that I have found. 14:05

22 Q. Okay. Thank you. And in the citations that 14:05

23 you have just provided, can you find any discussion of 14:05

24 the specific language -- not just the term "module 14:05

25 generating assembly," but the specific language -- 14:05

1 appearing in the limitation at column 9, lines 9 14:05
2 through 11? 14:06
3 A. I would believe the answer -- Strike that. 14:06
4 The answer would be that the teaching or 14:06
5 that the wording is as contained in the specification. 14:06
6 Q. I'm sorry. I don't understand. I don't 14:06
7 understand that. 14:06
8 MR. PALAVAN: One second. One second. 14:06
9 Leigh, can you just move your camera to your 14:06
10 right. You keep leaning to the right, so if you could 14:06
11 just move it to the right. 14:06
12 THE WITNESS: I'm leaning to the right, 14:06
13 Mr. Palavan, because I'm looking at the patent. 14:06
14 MR. PALAVAN: Yeah, that's what I'm saying. 14:06
15 So can you just shift your thing to the right? Yeah, 14:06
16 there you go. Perfect. 14:06
17 THE WITNESS: Does that help? 14:06
18 MR. PALAVAN: Yeah. That way, Ms. Hoover is 14:06
19 not having to go like this in following you. 14:06
20 THE WITNESS: Perfect. Happy to 14:06
21 accommodate. 14:06
22 Could you rephrase the question. Could you 14:06
23 restate the question, Ms. Lamkin. 14:06
24 Q. BY MS. LAMKIN: I'm asking you to explain 14:06
25 your response to the question. 14:06

1 Ms. Hoover, can you reread his response. 14:06

2 (Record read.) 14:06

3 THE WITNESS: I'm asking Ms. Lamkin to 14:07

4 repeat the question, not my answer, Ms. Hoover and 14:07

5 Ms. Lamkin. 14:07

6 MS. LAMKIN: Okay. I'll do it. 14:07

7 Q. BY MS. LAMKIN: In the citations that you 14:07

8 just provided, please point out any discussion of the 14:07

9 specific language in column 9, lines 9 through 11. 14:07

10 A. My answer would be that the wording in the 14:07

11 specifications speaks for itself. I have no 14:07

12 interpretation to provide. 14:07

13 Q. I'm not asking for interpretation, sir. I'm 14:07

14 asking you to point to a specific discussion of the 14:07

15 language in column 9, lines 9 through 11, in the 14:07

16 citations you've provided. 14:07

17 A. My answer would be that the wording in the 14:07

18 specification speaks for itself. 14:07

19 Q. And can you point to any language in the 14:07

20 specification that discusses "a module generating 14:08

21 assembly structured to receive at least one 14:08

22 verification data element corresponding to the at 14:08

23 least one entity"? 14:08

24 A. My answer would be, as I repeat it again, 14:08

25 Ms. Lamkin -- I'll repeat it again -- that the wording 14:08

1 Q. Is that an accurate statement in your 16:26
2 declaration? 16:26
3 A. Yes. 16:26
4 Q. Just read it into the record: "I have more 16:26
5 than 20 years of experience involving claim 16:26
6 construction and claim charts in connection with 16:26
7 patent litigation. I also personally analyzed the 16:27
8 claims and the claim constructions in this case prior 16:27
9 to the filing of the lawsuit," unquote. 16:27
10 That statement's accurate, Mr. Rothschild? 16:27
11 A. I believe it's accurate as to this case, as 16:27
12 to the -- 16:27
13 Q. Do you -- Please, sir. 16:27
14 A. I believe it's accurate -- Thank you. I 16:27
15 believe it's accurate as to this case, in the case of 16:27
16 -- and accurate as to this patent, 8,788,090. 16:27
17 Q. Okay. And then the next page, let me know 16:27
18 when you've read that. 16:27
19 A. I've completed reading it, Ms. Lamkin. 16:28
20 Q. Okay. Is there anything in this declaration 16:28
21 that you -- that is inaccurate, to the best of your 16:28
22 recollection? 16:28
23 A. There is not, to the best of my 16:28
24 recollection. 16:28
25 Q. Okay. Do you recall in the RCDI matter that 16:28

1 the District Court ultimately awarded attorneys' fees 16:28
2 against RCDI? 16:28

3 A. I recall that in the -- in this matter, the 16:28
4 District Court did not award attorneys' fees against 16:28
5 RCDI. Your statement is not correct. 16:29

6 What happened, to the best of my 16:29
7 recollection, is the court denied attorneys' fees. 16:29
8 The other side appealed, to the best of my knowledge, 16:29
9 to the federal circuit. The circuit came back and 16:29
10 contradicted or disagreed with the federal district 16:29
11 judge and told the district judge -- told the district 16:29
12 judge to award attorneys' fees. And, at that point, 16:29
13 the attorneys -- I'm sorry -- the federal district 16:29
14 judge followed the circuit's recommendation and 16:29
15 awarded attorneys' fees against the plaintiff, 16:29
16 Rothschild Connected Device Innovation. 16:29

17 Q. And then when the District Court awarded 16:29
18 attorneys' fees against RCDI, did RCDI pay the 16:29
19 attorneys' fees? 16:29

20 A. RCDI attempted to negotiate to pay the 16:29
21 attorneys' fees with the plaintiff. The plaintiff did 16:30
22 not accept, to the best of my knowledge -- I'm sorry. 16:30
23 The defendant. Excuse me. The defendant did not 16:30
24 accept our offer to pay. 16:30
25 RCDI was prepared to pay attorneys' fees in 16:30

1 some amount, and was negotiating back and forth for 16:30
2 lower amounts, which was agreed to at some point by 16:30
3 the defendant. But a solution -- We were in 16:30
4 negotiations, continual negotiations. A settlement 16:30
5 was never reached. RCDI never refused to pay 16:30
6 attorneys' fees at any point, to the best of my 16:30
7 knowledge. That was done by my general counsel, at 16:30
8 the time, in the negotiation process. 16:30
9 So your statement about refusing to pay 16:31
10 attorneys' fees, or didn't pay them, is not correct, 16:31
11 Ms. Lamkin. 16:31
12 MS. LAMKIN: I'm going mark as Exhibits 21 16:31
13 and 22 -- 16:31
14 THE WITNESS: I'd also point out for the 16:31
15 record, for your further knowledge, Ms. Lamkin, that a 16:31
16 judgment was never obtained, to the best of my 16:31
17 knowledge, against the company. 16:31
18 The court was in fact inquiring, the federal 16:31
19 district court, why the -- why the defendant did not 16:31
20 go for a judgment in this matter, and the defendant 16:31
21 said at this point they didn't want a judgment. It 16:31
22 might have been because there was negotiations ongoing 16:31
23 and that the matter was supposed to be settled between 16:31
24 the parties -- which is what the court, I believe, 16:32
25 from my point of view, was hoping for. 16:32

1 A. Correct. 16:33

2 Q. Okay. Exhibit 21 goes on to say at 16:34

3 paragraph 2: "As part of the fee submission, ADS 16:34

4 requested that this court hold Mr. Rothschild jointly 16:34

5 and severally liable with RCDI." 16:34

6 Quote: "So as not to require further 16:34

7 unnecessary litigation, ADS seeks the award of fees 16:34

8 and expenses to be entered jointly and severally 16:34

9 against the entity RCDI and its sole member, Leigh M. 16:34

10 Rothschild, as the two are one in the same." 16:34

11 Does that refresh your recollection that ADS 16:34

12 tried to name you as a party in this matter, 16:34

13 Mr. Rothschild? 16:34

14 A. That's correct. 16:34

15 Q. And then in paragraph 3 of Exhibit 21, it 16:34

16 says: "On November 8th, 2017, the court ordered the 16:34

17 fee order." 16:35

18 Quote: "It is ordered that Rothschild 16:35

19 Connected Devices Innovations ('Rothschild') shall pay 16:35

20 ADS attorneys' fees and costs." 16:35

21 Again, is that consistent with your 16:35

22 recollection that ADS -- that RCDI was ordered to pay 16:35

23 attorneys' fees and costs in this matter? 16:35

24 A. That's correct. 16:35

25 Q. In paragraph 4, it says: "This court 16:35

1 and five dollars as its assets? 16:36

2 A. I do not recall that. I do not know if 16:37

3 that's correct. 16:37

4 Q. Okay. Do you have any reason to doubt that 16:37

5 representation by RCDI at the time? 16:37

6 A. I have every reason to doubt it, because I 16:37

7 don't have any knowledge of it. 16:37

8 Q. Okay. "As of the date of this motion, RCDI 16:37

9 has failed to comply with the fee order, as RCDI has 16:37

10 neither paid the amount directed to be paid ... nor 16:37

11 has RCDI made any notification to this court." 16:37

12 Is that consistent with your recollection of 16:37

13 the matter, sir? 16:37

14 A. It is not consistent, in the fact that I 16:37

15 testified earlier that negotiations were ongoing, 16:37

16 where we made several offers to pay from our general 16:37

17 counsel at the time to the company. Numerous 16:37

18 discussions, in my memory, were held and negotiations 16:37

19 went back and forth in terms of payment, right until 16:38

20 the case ended. 16:38

21 Q. Do you have any recollection of RCDI ever 16:38

22 paying to ADS the ordered fee award? 16:38

23 A. I do not. 16:38

24 Q. Turn to Exhibit 22. 16:38

25 A. But I would add to the statement that a 16:38

1 judgment was never entered in this matter, as I 16:38
2 testified to earlier, that the court was asking why 16:38
3 the plaintiff was -- why the defendant, excuse me, was 16:38
4 not seeking a judgment. No answer, to my knowledge, 16:38
5 was given. And I again repeat for the record that 16:38
6 negotiations were ongoing, where offers were made to 16:38
7 pay this amount from RCDI to the defendant. 16:38

8 Q. Mr. Rothschild, I've personally reviewed the 16:38
9 docket. I don't see any evidence of that. 16:38

10 Do you think you can produce that evidence, 16:38
11 sometime after this deposition, for my review? 16:38

12 A. Many years ago. I have no knowledge whether 16:38
13 it would be evidence or not. The person that was the 16:38
14 general counsel at the time no longer works for us and 16:39
15 hasn't for many, many years. He would hold those 16:39
16 records, if there were any records. What happened to 16:39
17 them, I don't know. I've never seen anything in that 16:39
18 regard. But I am testifying hereto that there were 16:39
19 numerous conversations that were held, as reported to 16:39
20 me by counsel, to pay. 16:39

21 Q. Looking now at Exhibit 22, an order dated 16:39
22 August 13th, 2019. 16:39

23 Do you understand, sir, that a report and 16:39
24 recommendation is an order from the court? 16:39

25 A. I'm sorry. Say again. 16:39

1 I do know that the court specifically told, 16:43
2 as I previously testified, that I would not be brought 16:43
3 into the case until service was effectuated and a 16:43
4 hearing would be held on the matter to determine the 16:43
5 merits of bringing me in. And -- 16:43

6 Q. And -- 16:43

7 A. Excuse me. And I believe the record 16:44
8 supports that. 16:44

9 Q. Did either RCDI or you personally ever pay 16:44
10 any portion of the court order awarding attorneys' 16:44
11 fees in this matter? 16:44

12 A. I repeat my testimony that no payment was 16:44
13 made for RCDI, and that ongoing negotiations were 16:44
14 being held to effectuate payment, but a judgment was 16:44
15 never filed by the court, even though the court was 16:44
16 wondering if they were going to seek a judgment. 16:44

17 I also repeat my testimony -- I also state 16:44
18 for the record that I was never asked by the court to 16:44
19 pay anything; that the court was -- the court was 16:44
20 asking for me to be served, to decide whether they 16:44
21 were to bring me into the case. 16:44

22 Q. Mr. Rothschild, you have a right, and I'm -- 16:44
23 I'm perfectly happy to let you explain your answer, 16:44
24 but I first need an answer. 16:44

25 So it's a yes-or-no question, and then, 16:44

1 please, you have a right to explain yourself. 16:45

2 Did RCDI ever pay any attorneys' fees 16:45

3 pursuant to the order ordering attorneys' fees to be 16:45

4 paid? 16:45

5 A. No, we did not. 16:45

6 Q. Okay. And did you personally ever pay any 16:45

7 attorneys' fees based on the order from the court 16:45

8 ordering that attorneys' fees be paid? 16:45

9 A. No. And to explain, as you said you would 16:45

10 currently allow me to explain: I was never ordered by 16:45

11 the court to pay anything to RC -- from RCDI or pay 16:45

12 anything to -- I'm sorry. I was never ordered by the 16:45

13 court, me personally, to pay any sum of money to the 16:45

14 defendant. 16:45

15 Q. And your recollection is that's because you 16:45

16 were not properly served; right? 16:45

17 A. My recollection would be that I was not 16:45

18 properly served, and the court had stated that I would 16:45

19 need to be properly served and that the court would 16:45

20 have a hearing to determine the merit of bringing me 16:45

21 into the case. 16:46

22 Q. You could have paid the money; right? You 16:46

23 knew the court ordered attorneys' fees paid, and 16:46

24 either you or RCDI could have paid the money; right? 16:46

25 A. Absolutely incorrect. 16:46

1 Q. Why not? 16:46

2 A. As far as me paying the money, I had no 16:46

3 obligation, as I just said, to pay any money. It 16:46

4 would be absolutely not the case that I had any 16:46

5 obligation, any legal obligation, at that point, to 16:46

6 pay. And as I've testified -- So that's the answer to 16:46

7 the second question, as to why I didn't pay. I had no 16:46

8 legal obligation to pay. 16:46

9 Your first question, I believe, Ms. Lamkin, 16:46

10 is why RCDI did not pay. As I've testified to now 16:46

11 numerous times today, RCDI was in negotiation with the 16:46

12 defendant as to effectuate a payment settlement. 16:46

13 Q. The court issued an order ordering RCDI to 16:46

14 pay attorneys' fees; correct? 16:46

15 A. I believe so. 16:46

16 Q. And RCDI did not honor that order; correct? 16:47

17 A. I don't know if the order was not honored. 16:47

18 That would be a legal determination. But I will tell 16:47

19 you, and I've testified and I will testify again, that 16:47

20 the company RCDI was in negotiation to pay to the 16:47

21 defendant an amount of money that would satisfy them 16:47

22 in this matter. 16:47

23 MS. LAMKIN: I'm going to mark Exhibit 23 16:47

24 the complaint from case number 1:19-cv-01109, 16:47

25 Rothschild Digital Confirmation v. CompanyCam. 16:48

1 (Exhibit 23 marked.) 16:48

2 Q. BY MS. LAMKIN: Have you ever seen 16:48

3 Exhibit 23 before, Mr. Rothschild? And I'm happy to 16:48

4 flip through it if that would help you. 16:48

5 A. Well, Ms. Lamkin, for the record, I'm only 16:48

6 seeing the first two sentences after the title page, 16:48

7 "plaintiff ... through its undersigned attorneys" -- 16:48

8 and now you're scrolling. 16:48

9 Q. Correct. Would you like me to scroll 16:48

10 through the document for you, sir? 16:48

11 A. Yes, I would. Yep. 16:48

12 Q. Okay. I'll just do it page by page, and you 16:48

13 tell me when you're ready for the next page. 16:48

14 A. Ms. Lamkin, are you asking me to read each 16:48

15 page, or you just want me to kind of quickly scroll 16:48

16 through it? 16:48

17 Q. I'm sure not, sir. I'm just -- Whatever you 16:48

18 need to tell -- to ascertain whether or not you've 16:48

19 seen this document before. 16:48

20 A. I don't recollect with specificity whether 16:48

21 I've seen the document before. 16:48

22 Q. Okay. In general, do you review the 16:49

23 complaints before they're filed? 16:49

24 Let me ask that a better way, sir. That's a 16:49

25 terrible question. 16:49

1 A. Sometimes I do, sometimes I don't. I will 16:49
2 tell you that I rely upon my attorneys to file a 16:49
3 correct complaint. 16:49
4 Q. Do you recall this case, RDC v. CompanyCam? 16:49
5 A. There is a recollection but not with 16:49
6 specificity. 16:49
7 Q. What do you remember about this case? 16:49
8 A. I remember that you were counsel, I believe, 16:49
9 for the defendant. 16:49
10 Q. Do you remember anything else? 16:49
11 A. I remember that a settlement was achieved, 16:49
12 no money was paid by either side; that counsel -- my 16:49
13 counsel negotiated with you, Ms. Lamkin, and I guess 16:49
14 on behalf of the client -- 16:49
15 Q. Wait, wait. Don't -- If you're about to -- 16:49
16 Don't say any of the terms on the record, because it's 16:49
17 a separate matter. 16:49
18 A. Hmm. Settlement was achieved -- 16:49
19 Q. Okay. Fine. 16:50
20 A. -- to the full satisfaction of all action. 16:50
21 Q. I'm going to move to strike that. It's a 16:50
22 confidential, unrelated matter; so let's just not have 16:50
23 that on the record, please, sir. 16:50
24 Do you recall which entity or persons are 16:50
25 the manager, or were the manager, of RDC? 16:50